## ORIGINAL

DISTRICT COURT OF GUAM MAR 3 0 2005

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Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

Vs.

CAUSING THE FAILURE TO
FILE A CURRENCY
TRANSACTION REPORT

[18 U.S.C. § 2, 31 U.S.C. §§ 5324(a)(2)
& 5322(a), and 31 C.F.R. §§ 103.11 &
10.22]

THE UNITED STATES ATTORNEY CHARGES:

## CAUSING THE FAILURE TO FILE A CURRENCY TRANSACTION REPORT

On or about May 27, 2004, the District of Guam, the defendants herein, MAI LY WONG and MARVA J. GUERRERO, did knowingly and willfully and for the purposes of evading the reporting requirements of Section 5313(a) of Title 31, United States Code and the regulations promulgated thereunder, cause a domestic financial institution, to-wit: First Hawaiian Bank, at which they purchased seven (7) cashiers checks, each in the amount of \$9,880, for \$69,260 cash, to fail to file with the Internal Revenue Service a report required to be filed under Section 5313(a) of 31 United States Code and the regulations promulgated thereunder, 31 Code of

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1	Federal Regulations, Section 103.22, in connection with the receipt, exchange, withdrawal and
2	transfer of United States currency in excess of \$10,000,
3	ALL IN VIOLATION OF Title 18, United States Code, § 2, and Title 31, United States
4	Code, §§ 5324(a)(2) & 5322(a), and 31 C.F.R. §§ 103.11 & 10.22.
5	Dated this 29 day of March, 2005.
6	LEONARDO M. RAPADAS
7	United States Attorney Districts of Guam and CNMI
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9	By: Saron V Johnson
LO	Assistant U.S. Attorney
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